



Paulette Morgan
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September 5, 2013

Hon. Joseph F. Bianco
United States District Court Judge
United States District Court for the Eastern
District of New York
100 Federal Plaza
Courtroom 920
Central Islip, New York 11722

Re: *Claudia Tholl v. Bank of America et al.*
Civ. Act. No. 13-3858

Dear Judge Bianco:

This firm represents Bank of America in the captioned action. We write to request an extension of time in which to answer or otherwise respond to the Complaint from September 9, 2013 to October 9, 2013. This is our first request for an extension of time. We request this extension of time in order to conduct a sufficient factual investigation to evaluate the allegations and prepare a response to the plaintiff's Complaint. We made a specific request for this extension of time with plaintiff's counsel's office on September 4, 2013, and were told that plaintiff's counsel was out of the office until Monday, but, that the request would be provided to him. We have not yet heard back from this request and, accordingly, respectfully submit this request to the Court.

Thank you for your consideration of this matter.

Respectfully submitted,

A handwritten signature in black ink that reads 'Paulette Morgan'.

Paulette Morgan.

cc: Eitan Nof, Esq.
Michael H. Bernstein, Esq.
Christopher Coxon, Esq.

CERTIFICATE OF SERVICE

I, PAULETTE MORGAN, hereby certify and affirm that a true and correct copy of the attached **LETTER DATED SEPTEMBER 5, 2013** was served via ECF on this 5th day of September, 2013, upon the following:

Eitan Noff, Esq.
Mandell & Santora
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Christopher Coxon, Esq. (by mail)
United Healthcare Company of New York

/s Paulette Morgan
Paulette Morgan

Dated: New York, New York
September 5, 2013